IDAHO DEPARTMENT
OF HEALTH AND WELFARE

DIVISION OF
ENVIRONMENTAL QUALITY

1410 North Hilton, Boise, ID 83706-1255, (208) 334-0502

Philip E. Batt, Governor

February 14, 1995

Ms. Lisa Green, Director
Environmental Restoration Program
U.S. Department of Energy
Idaho Operations Office
850 Energy Drive
Idaho Falls, Idaho 83401-1563

SUBJECT: IDHW Review Comments for Preliminary Scoping Track 2 Summary Report for Operable Unit 7-01

Dear Ms. Green:

The following are Idaho Department of Health and Welfare, Division of Environmental Quality's (IDHW/DEQ) review comments for Preliminary Scoping Track 2 Summary Report for Operable Unit 7-01:

General Comment:

DOE-ID has presented in this document a more acceptable risk assessment (deterministic and thus conservative) methodology than the earlier Track 2 versions (probalistic). The revised methodology in our opinion is a better "fit" given the on-going "screen" evaluation now being conducted for the OU 7-13 RI/FS using a 1E-07 risk value. A probalistic risk assessment will be performed for the entire SDA after the current screening step and other assessments are conducted to indeed present the final risk for the SDA through it's intended disposal life.

Specific Comment:

Page 13, Section 3.1, third paragraph

It appears that the use of 1E-01 Ci, remaining after 50 years, as a screening level is very conservative, but the rationale for choosing this value is not clear. This screening step is only risk based in that the assumption is made that 1E-01 Ci of any nuclide would not provide a significant risk in the groundwater. This is a reasonable assumption, and it avoids running GWSCREEN on the entire inventory of nuclides. An alternative method would be to run GWSCREEN and eliminate contaminants contributing less than 1E-06 risk. Another approach would be to use the ratio of travel time to half-life, and select a value for this ratio to use as the screening factor. This approach would still entail using GWSCREEN, as well as requiring the

selection of a subjective screening value. Nevertheless, a screening step based on the estimated travel time for each radionuclide in relation to it's half-life would be a more direct risk-based screening step.

In this respect, as it appears that the OU 7-13 Pits and Trenches RI/FS may serve as the OU 7-14 comprehensive RI/FS for WAG 7, we request that OU 7-13 clearly tie together all of the Track 1 and 2 subsurface sites at RWMC and any differences in the performance of individual risk assessments. For example, the integrity of solid, essentially non-leachable materials in engineered soil vaults versus corroding boxes and drums in the pits, and the likely remediation, if necessary, to reduce unacceptable risks, should be able to be presented in a semi-quantitative manner, after the very conservative initial screening and subsequent probalistic modeling is completed.

Sincerely,

Daryl Koch
WAG 7 Manager
Remediation Bureau

DK/jc

cc: M.J. Nearman, EPA Region 10
Shawn Rosenberger, DEQ-IF
Dean Nygard, DEQ-Boise